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Telephone Conference

way of naturally replacing the old in the electronics market. Permitting trunked operation on frequencies below 512 MHz. is good and we would support that.

The promotion of interoperability appears to be useful for communication between different types of public agencies. we would support the creation of a few channels for the sole purpose of mutual aid.

On Exclusivity: It appears that the exclusivity rule may open the door to abuse by large operators. The adoption of the Exclusive Use Overlay (EUO) will obviously favor large licensees. Small individual licensees will be edged out and have to subscribe to large service providers.

On Radio Services: Under Frequency Coordination, the proposed rule change says that Small Systems not qualifying for an EUO Preference should be stacked on the same frequency (vertical loading), rather than be assigned separate channels (horizontal loading). This would make available channels to conventional systems overcrowded. Assignment without regard to eligibility would lump together diverse types of users making the frequencies chaotic.

On Modification of Existing Channels: Adjustments to systems to conform to narrow band requirements will not be as simple as reducing transmitter deviation. While that may conform transmitters to the new rule, system operation will be degraded with lower receiver levels.

Conclusion: In conclusion we submit that, while some parts of these proposed rules are good and necessary, they are as a whole too much too soon. It will all cost money. We live in a country recovering from a recession and faced with paying off a huge deficit. We don't need this additional burden. It is a burden from the aspect of both paying for the changes and limiting the usefulness of existing communication systems.

Please keep the small radio system user in rural areas like ours in mind while enacting new rules.

Respectfully submitted,



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